

### **REMARKS**

Claims 1-9, 11-17, 19-29, and 31-32 are pending in this application. The Examiner has previously indicated allowable subject matter existed in the last Office Action and has now withdrawn that indication in light of the same reference cited in the previous Office Action.

### **Rejections under 35 U.S.C. § 102**

Applicants respectfully request reconsideration of the rejection of claims 1, 2, 4, 6-9, 11-17, 19-29, and 31-32 under 35 U.S.C. § 102 as being anticipated over U.S. Patent Publication No. 2002/0184632 to *Reitmeier* in light of the arguments contained herein.

As discussed in previous responses, independent claim 1 includes the feature of a comparison component configured to compare a portion of the first set of display data to the key data value to determine whether the portion of the first set of display data is to be modified with a corresponding portion of the second set of display data without storing the second set of display data in the memory, among other features. The Examiner asserts that paragraph 25 and Figure 2 of *Reitmeier* discloses this feature. Applicants respectfully disagree with this assertion.

*Reitmeier* discloses a peripheral device for taking a video signal from a television, converting the video signal to a digital signal if necessary, and displaying this video signal within a window of a computer monitor (See Figure 1, and paragraph 6). The peripheral device, which functions as a tuner card, is located in between the tower of a personal computer and a corresponding monitor. The peripheral device enables a television signal to be displayed within a window of a web page being displayed on the

computer monitor. The peripheral device processor overlays the scaled television signal over the corresponding windows of the web page and transmits the combined digital video signal (see Figure 2 and paragraph 27). Nowhere does *Reitmeier* disclose comparing a portion of the web page data to a key data value to determine if the portion of the web page data is to be modified by a portion of television data, without storing the portion of television data in memory. *Reitmeier* overlays a television signal in a window of a web page and thereafter transmits the combined signal. *Reitmeier* must store the TV data and the web page data in order to generate the combined data and then transmit the combined data. *Reitmeier* does not disclose that either the TV data or the web page data is not stored. Moreover, *Reitmeier* contains no teaching as to how the TV data is scaled or cropped without being stored in a memory associated with device processor 112.

Furthermore claim 1 specifies an image overlay apparatus that includes a memory for storing a first set of display data, the first set of display data including a set of key data associated with a key data value. The Examiner references web server 10 of Figure 1 as disclosing the memory. However, Applicants respectfully request where in *Reitmeier* it is disclosed that any memory in the web server stores a set of key data. As stated in paragraphs 25 and 26, the processor 104 of the PC passes control information to the device processor 112. Thus, the processor 104 generates the control information by analyzing the web page data and the web server does not store the key data.

With regard to claim 2, which specifies that a portion of the first set of data is modified with a portion of a second set of data during transmission of the first set of data to an output, Applicants respectfully submit that *Reitmeier* fails to disclose this feature. In *Reitmeier* the web page data and the scaled video data are combined in keying block

208 (see Figure 2), which then is transmitted to a video output interface. *Reitmeier* fails to teach the features of claim 2 are taught; instead paragraph 23 of *Reitmeier* teaches that the TV and web page data are combined prior to being transmitted to the video output.

Claim 4 specifies the feature of the second set of display data including a synchronization signal, the comparison component defined to use the synchronization signal for determining when to start comparing the portion of the first set of display data to the key data value. The Examiner broadly refers to paragraphs 23 and 28 as disclosing this feature. Applicants cannot find any reference in these paragraphs to a synchronization signal that is included in the television signal and where the synchronization signal determines when to start comparing a portion of the web page data to the key value. Furthermore, as Applicants have previously stated above with reference to claim 1, a comparison component having the features of claim 1 is not disclosed by *Reitmeier*. Accordingly, it cannot be reasonably asserted that *Reitmeier* discloses a synchronization signal used by the comparison component. Applicants respectfully submit that claims 1, 2, 4, 6-9, and 11-12 are not anticipated by *Reitmeier* for at least the above stated reasons.

Claim 13 includes the feature of comparison circuitry configured to receive both image overlay data from a source external to the memory region and the display data from the memory region according to a synchronization signal, the comparison circuitry further configured to modify the key data with the image overlay data during transmission of the display data to a display panel without storing the image overlay data in the memory. As stated above with reference to claim 1, *Reitmeier* fails to disclose comparison circuitry configured to modify the key data with the image overlay data

during transmission of the display data to a display panel without storing the image overlay data in the memory. Additionally, nowhere does *Reitmeier* disclose comparison circuitry configured to receive both image overlay data from a source external to the memory region and the display data from the memory region according to a synchronization signal. The Examiner now asserts that keying module 208 includes a memory that stores the web page but not the TV signal. The Examiner appears to be taking the position that with regard to claim 1, the web server functions as the memory, but with regard to claim 13 that the device processor 112 includes the memory for storing the web page but that the TV signal is not stored in the memory. Applicants respectfully submit that there is no support in *Reitmeier* for these assertions. Claims 13-17 and 19-20 are not anticipated by *Reitmeier* for at least the above stated reasons.

Claim 21 includes the feature of receiving a second set of display data, the second set of display data defining an image having a shape and a size, the second set of display data not being stored within a memory region storing the first set of display data. The Examiner broadly cites Figure 1 as disclosing this feature. With regard to claim 13, the Examiner asserted that keying module 208 includes a memory region that stores the web page data. Now, with regard to claim 21, the Examiner broadly refers to Figure 1 as disclosing that the web page data is not stored in a memory storing the TV data. However, the web data and the TV data are combined in keying module 208. Applicants, however, find no teaching in *Reitmeier* as to combining the web page data and the TV data without storing the combination (which includes the TV data) in keying module 208, so that the combination can be transmitted to the video output interface. The claimed

invention provides an answer for avoiding the storage of the second set of display data; however, *Reitmeier* is silent as to this feature.

### **Rejections under 35 U.S.C. § 103**

Claim 3 was rejected as being unpatentable under USC §103 over the combination of *Reitmeier* and US Patent No. 5,914,728 to *Yamagisha et al.* The latter reference, however, does nothing to cure the deficiencies of *Reitmeier* noted above with reference to claim 1.

Claim 5 was rejected as being unpatentable under USC §103 over the combination of *Reitmeier* and US Patent No. 5,751,277 to *Inoue*. The Examiner cites column 1, lines 15-25 of *Inoue* as disclosing this feature. Applicants respectfully submit that the cited section of *Inoue* does not disclose this feature at all. Throughout *Inoue* a VRAM of the graphics controller is used as the memory for the FLCD (see Figures 1, 7, and 8 as well as corresponding text). Applicants submit that *Inoue* does not disclose nor teach a memory region in the LCD panel, as the only embodiments disclosed by *Inoue* include a VRAM of a graphics controller for the FLCD. Panel refreshes are performed through the VRAM, as is the traditional approach currently, and at the time of the filing of *Inoue*. In addition, the Examiner asserts that if *Inoue* disclosed a memory region in the LCD panel, a proposition with which Applicants disagree, then one skilled in the art would have included the LCD having a memory region into *Reitmeier* to enable improved control of the display position of information to be displayed. *Inoue* is directed to a display panel having interlaced scanning and partial write non interface driving (see column 1, lines 44-52). *Reitmeier* displays the data in a non-interlaced format, i.e., on a


Application No. 10/672,388  
VP089

Response to Office Action mailed October 18, 2005

CRT. The television signal of *Reitmeier* is converted to a digital signal through peripheral device 110, thus the signal supplied to the monitor is a non-interlaced signal. Consequently one skilled in the art would not have looked to the interlaced display panel of *Inoue* as suggested by the Examiner. Accordingly claim 5 is patentable over the cited combination for at least these reasons.

Applicants respectfully submit that, in view of the foregoing, all pending claims are in condition for allowance. A notice of allowance is respectfully requested. In the event a telephone conversation would expedite the prosecution of this application, the Examiner may reach the undersigned at (408) 952-6126.

Respectfully submitted,

  
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